

EXHIBIT A 2

STATE OF NEW YORK
COUNTY OF [illegible]
[illegible]
[illegible]
[illegible]

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
[illegible]

IN SENATE
JANUARY 11, 1915
OF NEW YORK SERVICE TO BE
[illegible]

IN SENATE
JANUARY 11, 1915
OF NEW YORK SERVICE TO BE
[illegible]

IN SENATE
JANUARY 11, 1915
OF NEW YORK SERVICE TO BE
[illegible]

IN SENATE
JANUARY 11, 1915
OF NEW YORK SERVICE TO BE
[illegible]

IN SENATE
JANUARY 11, 1915
OF NEW YORK SERVICE TO BE
[illegible]

U.S. DISTRICT COURT OF THE STATE OF NEW YORK

COUNTY OF EASTERN

Trans #: 10709072
File #:
Index #: CV-3027/10
Filed: NO Court Date: / /
Mortg #:

GERALYN GANCI

Petitioner (s)
Plaintiff (s)

- vs -

US LIMOUSINE SERVICE LTD ET AL

Defendant (s)
Respondent (s)RONALD A LENOWITZ
7600 JERICHO TURNPIKE
SUITE 300
WOODBURY, NY 11797STATE OF NEW YORK: COUNTY OF NASSAU ss:BASSAM SHATARA, BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION AND IS OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.That on JULY 08, XX2010 10:27 AM, at 1827 GILFORD AVE, NEW HYDE PARK, NY 11040deponent served the within SUM/COMP/INDEX NO&DATE FILED ENDOERSED THEREON onU.S. LIMOUSINE SERVICE LTD. defendant therein named.

INDIVIDUAL

1 ☐

By Personally delivering to and leaving with said _____ a true copy thereof,

and that he knew the person so served to be the person mentioned and described in said _____

☐ Defendant was identified by self admission and by the photograph furnished.

CORPORATION

2 ☒By delivering to and leaving with JOSEPH CARLETTO-AUTH. PARTY at 1827 GILFORD AVE, NEW HYDE PARK,NY 11040

_____, NY, and that he knew the person so served to be the managing/authorized agent of the corporation, and said person stated that he was authorized to accept service on behalf of the corporation.

Service was made in the following manner after your deponent was unable with due diligence to serve the defendant in person:

SUITABLE
AGE PERSON3 ☐

By delivering a true copy thereof to and leaving with _____, a person of suitable

age and discretion at _____, NY, the said premises being the defendants—respondents (dwelling place) (usual place of abode) (place of business) within the State of New York.

AFFIXING TO
DOOR, ETC.4 ☐

By affixing a true copy thereof to the door of said premises, the same being the defendant's (dwelling place) (usual place of abode) (place of business) within the State of New York.

MAILING
Use with 3 or 45 ☐

Deponent completed service under the last two sections by depositing a copy of the _____ in a postpaid, properly addressed plain envelope marked "Personal and Confidential" in an official depository under the exclusive care and custody of the United States Post Office in the State of New York, on _____.

PREVIOUS ATTEMPTS
Use with 46 ☐

Deponent had previously attempted to serve the above named defendant/respondent.

A DESCRIPTION OF THE DEFENDANT OR OTHER PERSON SERVED ON BEHALF OF THE DEFENDANT OR PERSON SPOKEN TO CONFIRMING NON MILITARY STATUS OF DEFENDANT IS AS FOLLOWS:

Approximate age 51-65 Approximate weight 131-160 Approximate height 5'4"-5'8" Sex MColor of skin WHITE Color of hair GRAY Other _____☐ Spoke with _____

who confirmed non-military status of defendant.

Deponent asked the person spoken to whether the defendant was presently in the military service of the United States Government or on active duty in the military service in the State of New York and was informed he was not. Your deponent further says that he knew the person so served to be the person mentioned and described in said legal papers as defendant/respondent therein. Your deponent is over the age of 18 years and is not a party to this action.

DIANNE JUSTICE
Notary Public, State of New York
No. 01105048773
Qualified in Nassau County

BASSAM SHATARA, LLC # 1128955

Interboro Attorney Service Corporation

2132 WANTAGH AVE. • P.O. BOX 1200 • WANTAGH, N.Y. 11793 • 516/221-2000



THE UNITED STATES OF AMERICA

FILED

DEPT.

U.S. DEPT. OF JUSTICE

WASHINGTON, D.C.

GA (1000)

ASSISTANT ATTORNEY GENERAL

DEPARTMENT OF JUSTICE

OFFICE OF THE ATTORNEY GENERAL

THE UNITED STATES OF AMERICA

DEPT.

U.S. DEPT. OF JUSTICE

WASHINGTON, D.C.

ATTORNEY GENERAL

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and that he knew the person so served to be the person mentioned and described in said _____

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SWORN AND JUSTICE

Notary Public, State of New York

No. 01JU5048773

Qualified in Nassau County

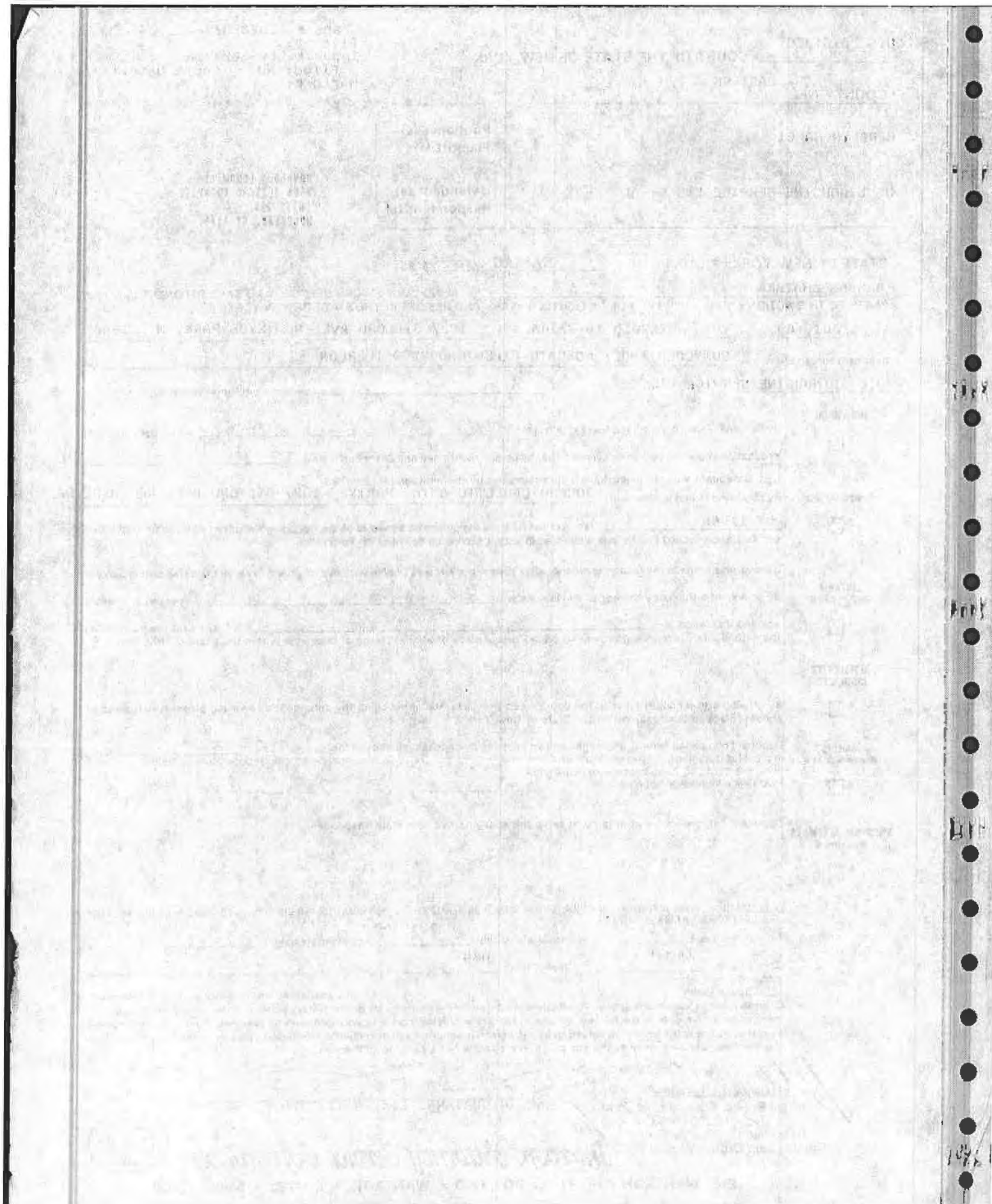
Commission Expires August 28, 20

BASSAM SHATARA, Lic. # 1128956

Interboro Attorney Service Corporation

2132 WANTAGH AVE. • P.O. BOX 1200 • WANTAGH, N.Y. 11793 • 516/221-2000





AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the
EASTERN DISTRICT OF NEW YORK

GERALYN GANCI

Plaintiff

v.
U.S. LIMOUSINE SERVICE, LTD.
AND RAYMOND TOWNSEND

Defendant

CV - 10 3027

Civil Action No.

BIANCO, J.

TOMLINSON, M

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

U.S. LIMOUSINE SERVICE LTD.
1827 GILFORD AVENUE
NEW HYDE PARK, NEW YORK 11040

RAYMOND TOWNSEND
c/o U.S. LIMOUSINE SERVICE, LTD.
1827 GILFORD AVENUE
NEW HYDE PARK, NEW YORK 11040

A lawsuit has been filed against you.

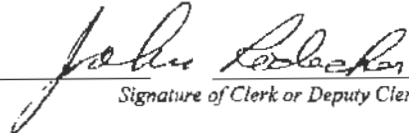
Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

RONALD A. LENOWITZ, ESQ.
7600 JERICHO TURNPIKE SUITE 300
WOODBURY, NEW YORK 11797
(516)-364-3080

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ROBERT C. HEINEMANN
CLERK OF COURT

Date: 01 JUL 2010


Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the
EASTERN DISTRICT OF NEW YORK

GERALYN GANCI

Plaintiff

v.
U.S. LIMOUSINE SERVICE, LTD.
AND RAYMOND TOWNSEND

Defendant

CV - 10 3027

Civil Action No.

BIANCO, J.

SUMMONS IN A CIVIL ACTION

TOMLINSON, M

To: (Defendant's name and address)

U.S. LIMOUSINE SERVICE LTD.
1827 GILFORD AVENUE
NEW HYDE PARK, NEW YORK 11040

RAYMOND TOWNSEND
c/o U.S. LIMOUSINE SERVICE, LTD.
1827 GILFORD AVENUE
NEW HYDE PARK, NEW YORK 11040

A lawsuit has been filed against you.

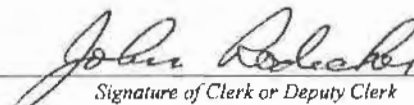
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ROBERT C. HEINEMANN
CLERK OF COURT

Date: 01 JUL 2010


Signature of Clerk or Deputy Clerk

JS 44 (Rev. 12/07)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS
GERALYN GANCI

(b) County of Residence of First Listed Plaintiff NASSAU
 (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)
RONALD A. LENOWITZ, ESQ., (RL 7171)
7600 JERICHO TPKE. WOODBURY, N.Y. 11797

DEFENDANTS
U.S. LIMOUSINE SERVICE, LTD. & RAYMOND TOWNSEND

County of Residence of First Listed Defendant NASSAU
 (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)
PIKE & PIKE P.C.
1921 BELLMORE AVENUE, BELLMORE, N.Y. 11710

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|---------------------------------------|---------------------------------------|---|----------------------------|---------------------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609

V. ORIGIN (Place an "X" in One Box Only)

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
Title VII of the Civil Rights Act of 1964, 14th Amendment

Brief description of cause:
Sexual Harassment in the Workplace; Retaliation

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ **5,000,000.00** CHECK YES only if demanded in complaint:
 Each Cause of Action JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

June 30, 2010

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

JS 44 (Rev. 12/07)

CIVIL COVER SHEET

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 (EXCEPT IN U.S. PLAINTIFF CASES)

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RONALD A. LENOWITZ, ESQ., (RL 7171)
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DEFENDANTS
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Attorneys (If Known)

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|---|---------------------------------------|---|---------------------------------------|
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(See instructions):

JUDGE

DOCKET NUMBER

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SIGNATURE OF ATTORNEY OF RECORD

June 30, 2010

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

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JS 44 (Rev. 12/07)

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I. (a) PLAINTIFFS GERALYN GANCI	DEFENDANTS U.S. LIMOUSINE SERVICE, LTD. & RAYMOND TOWNSEND
(b) County of Residence of First Listed Plaintiff <u>NASSAU</u> (EXCEPT IN U.S. PLAINTIFF CASES)	County of Residence of First Listed Defendant <u>NASSAU</u> (IN U.S. PLAINTIFF CASES ONLY)
(c) Attorney's (Firm Name, Address, and Telephone Number) RONALD A. LENOWITZ, ESQ., (RL 7171) 7600 JERICHO TPKE. WOODBURY, N.Y. 11797	Attorneys (If Known) PIKE & PIKE P.C. 1921 BELLMORE AVENUE, BELLMORE, N.Y. 11710

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)	III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)						
<input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 2 U.S. Government Defendant <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: left;">Citizen of This State</th> <th style="text-align: left;">Citizen of Another State</th> <th style="text-align: left;">Citizen or Subject of a Foreign Country</th> </tr> <tr> <td> <input checked="" type="checkbox"/> 1 PTF <input checked="" type="checkbox"/> 1 DEF Incorporated or Principal Place of Business in This State </td> <td> <input type="checkbox"/> 2 PTF <input type="checkbox"/> 2 DEF Incorporated and Principal Place of Business in Another State </td> <td> <input type="checkbox"/> 3 PTF <input type="checkbox"/> 3 DEF Foreign Nation </td> </tr> </table>	Citizen of This State	Citizen of Another State	Citizen or Subject of a Foreign Country	<input checked="" type="checkbox"/> 1 PTF <input checked="" type="checkbox"/> 1 DEF Incorporated or Principal Place of Business in This State	<input type="checkbox"/> 2 PTF <input type="checkbox"/> 2 DEF Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 3 PTF <input type="checkbox"/> 3 DEF Foreign Nation
Citizen of This State	Citizen of Another State	Citizen or Subject of a Foreign Country					
<input checked="" type="checkbox"/> 1 PTF <input checked="" type="checkbox"/> 1 DEF Incorporated or Principal Place of Business in This State	<input type="checkbox"/> 2 PTF <input type="checkbox"/> 2 DEF Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 3 PTF <input type="checkbox"/> 3 DEF Foreign Nation					

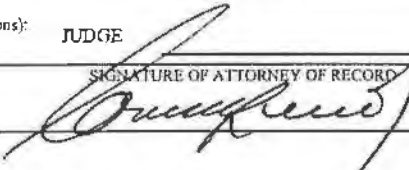
IV. NATURE OF SUIT (Place an "X" in One Box Only)					
CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	FORFEITURE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HHA (1395if) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN <input checked="" type="checkbox"/> 1 Original Proceeding	(Place an "X" in One Box Only) <input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify)	<input type="checkbox"/> 6 Multidistrict Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judgment
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VI. CAUSE OF ACTION	Cite the U.S. Civil Statute under which you are filing. (Do not cite jurisdictional statutes unless diversity.) <u>Title VII of the Civil Rights Act of 1964; 14th Amendment</u> Brief description of cause: <u>Sexual Harassment in the Workplace; Retaliation</u>
----------------------------	--

VII. REQUESTED IN COMPLAINT:	<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMANDS <u>5,000,000.00</u> CHECK YES only if demanded in complaint: Each Cause of Action JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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VIII. RELATED CASE(S) IF ANY	(See instructions): JUDGE _____	DOCKET NUMBER _____
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DATE June 30, 2010 SIGNATURE OF ATTORNEY OF RECORD 

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

JS 44 (Rev. 12/07)

CIVIL COVER SHEET

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I. (a) PLAINTIFFS
GERALYN GANCI

(b) County of Residence of First Listed Plaintiff NASSAU
 (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

RONALD A. LENOWITZ, ESQ., (RL 7171)
7600 JERICHO TPKE. WOODBURY, N.Y. 11797

DEFENDANTS
U.S. LIMOUSINE SERVICE, LTD. & RAYMOND TOWNSEND

County of Residence of First Listed Defendant NASSAU
 (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

PIKE & PIKE P.C.
1921 BELLMORE AVENUE, BELLMORE, N.Y. 11710

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|---------------------------------------|---------------------------------------|---|----------------------------|---------------------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition			

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing. (Do not cite jurisdictional statutes unless diversity.)
Title VII of the Civil Rights Act of 1964, 14th Amendment

Brief description of cause:
Sexual Harassment in the Workplace; Retaliation

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ 5,000,000.00 CHECK YES only if demanded in complaint:
 Each Cause of Action JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

June 30, 2010

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

JS 44 (Rev. 12/07)

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RONALD A. LENOWITZ, ESQ., (RL 7171)
7600 JERICHO TPKE. WOODBURY, N.Y. 11797

DEFENDANTS

U.S. LIMOUSINE SERVICE, LTD. & RAYMOND TOWNSEND

County of Residence of First Listed Defendant NASSAU
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

PIKE & PIKE P.C.
1921 BELLMORE AVENUE, BELLMORE, N.Y. 11710

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

☐ 1 U.S. Government Plaintiff ☒ Federal Question (U.S. Government Not a Party)

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III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input checked="" type="checkbox"/> 1	<input checked="" type="checkbox"/> 1	Incorporated or Principal Place of Business in This State	<input type="checkbox"/> 4	<input checked="" type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
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			IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	

V. ORIGIN

(Place an "X" in One Box Only)

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Brief description of cause:

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☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ 5,000,000.00 CHECK YES only if demanded in complaint:

Each Cause of Action JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

June 30, 2010

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

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JUDGE

MAG. JUDGE

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RONALD A. LENOWITZ, ESQ., (RL 7171)
7600 JERICHO TPKE. WOODBURY, N.Y. 11797

DEFENDANTS

U.S. LIMOUSINE SERVICE, LTD. & RAYMOND TOWNSEND

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(IN U.S. PLAINTIFF CASES ONLY)

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Attorneys (If Known)

PIKE & PIKE P.C.
1921 BELLMORE AVENUE, BELLMORE, N.Y. 11710

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- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|---------------------------------------|---------------------------------------|---|----------------------------|---------------------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 193 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions		

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity)

Title VII of the Civil Rights Act of 1964; 14th Amendment
Brief description of cause:
Sexual Harassment in the Workplace; Retaliation

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ 5,000,000.00 CHECK YES only if demanded in complaint:
Each Cause of Action DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

June 30, 2010

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

Geralyn Ganci
25 Homestead Lane
Levittown, New York 11756

June 1, 2009

New York State Division of Human Rights
OSHI
55 Hanson Place Suite 900
Brooklyn, New York 11217
Attn: Joyce Yearwood-Drury, Director O.S.H.I.

Re: Geralyn Ganci -v- U.S. Limousine Service, Ltd., and Raymond Townsend
Case No.: 10133069; Federal Charge No.: 16GA 903523

Dear Ms. Yearwood-Drury:

I have read and reviewed the "Position Statement" which you sent to me and which was prepared by counsel for U.S. Limousine Service, Ltd., and Raymond Townsend bearing date May 15, 2009 and I am compelled to Reply due to the false and egregious statements made by counsel and their failure to address the vile and disgusting conduct of Raymond Townsend toward me during my employment.

I submit that contrary to counsel's contention, my last day of work at U.S. Limousine Service, Ltd., was actually Saturday, February 21 2009 and that was the actual date of the sexual assault by Raymond Townsend. I will submit to a polygraph exam about that incident since it cannot be denied and suggest that Raymond Townsend be tested as well. I have reviewed my weekly Payroll Statements from U.S. Limousine Service, Ltd., and contrary to counsel's contention, my last day of work was truly not January 18, 2009. The Respondent's Weekly Payroll Statements belie such statement. (Despite the fact that I was working "off the books" along with most of the office and administrative staff at U.S. Limousine the Respondent furnished me with weekly Pay Statements which I have saved from the inception of my employment and which indicate the dates of employment and the amount of my earnings from inception through termination).

Contrary to counsel's contention and inference, I am not a lesbian, have never "dated" Samantha Castellano and consider such allegation as simply the respondent's further attempt to barass and defame me. I had no idea until reading the respondent's statement that Samantha even construed our friendship that way. Our common interest was simply the New York Mets, we worked in different locations at U.S. Limousines and merely text messaged each other about Met games. We hung-out on one occasion.

Contrary to counsel's contention I had reported the sexual harassment to John Sansone, the Respondent's Reservation's Manager about Raymond Townsend's persistent comments, vile and disgusting messages, gestures to me in the workplace during the workday and after hours and John Sansone's words to me were precisely that " I should never be alone with Raymond Townsend, that he is a pervert."

Contrary to counsel's contention I also reported Raymond Townsend's conduct toward me to another U.S. Limousine Service employee, Jean Pompei when Raymond Townsend called my extension to lure me into his private office under the ruse of retrieving his telephone charger. Her advice to me at that time was "don't you dare be alone with him," and we decided to send employee "Ali" to bring Raymond Townsend his telephone charger so that I would not be compelled to be alone with him in his office.

Contrary to counsel's contention, I also reported Raymond Townsend's sexual harassment to another U.S. Limousine Service employee, Robert Thatcher and since I knew that Robert Thatcher and Raymond Townsend were friends and had worked together I asked him to speak to Raymond Townsend to compel him to leave me alone. I was advised by Robert Thatcher that he did speak to Raymond Townsend about my complaints and his persistent sexual harassment but nothing came of it.

Contrary to counsel's contention I had absolutely no conversation with John Sansone on February 8, 2009 about returning to work. I was hospitalized at Winthrop Hospital at that time and made no such phonecall. The Hospital Records will confirm my confinement.

True to counsel's contention, I was friendly with Raymond Townsend's wife Nicole who also worked at U.S. Limousine and did in fact attend their wedding. That friendship made the sexual harassment by Nicole's husband all the more difficult for me since I considered her my friend and I was afraid to tell her about her husband. I became physically and emotionally sick over the persistent conduct of Nicole's husband yet I was unable to disclose to her what a pig her husband was, but I trust that she has finally become aware of his conduct by reason of this claim. Shortly after I filed this claim Nicole tried to contact me to "get the truth" about her husband. I did not return her phonecalls.

Contrary to counsel's contention, the only messages I sent to Raymond Townsend were specific refusals and/or rejections to his sexual advances and sexual gestures or relating to issues at work. Contrary to counsel's contention(s) the reduction of my hours of work at U.S. Limousine was simply the retaliation by Raymond Townsend to my refusal to sleep with him. Raymond Townsend said this directly to me at work.

AS TO HIS VILE AND DISGUSTING MESSAGES

The text messages sent to me by Raymond Townsend are preserved and despite counsel's contention the only sexual content in these messages came from Raymond Townsend and not from me. (In fact, couched in the Respondent's Response is a clear and unequivocal admission of the persistent sexual messages and the nature of the sexual messages which he sent to me). I submit that these "messages" from Raymond Townsend were not "friendly" in nature at all and were un-solicited by me in any respect and were sexually explicit, disgusting and humiliating. I have preserved these and will share same in the appropriate forum. (Many of the text messages ask me to assist him to "jerk off," specifically one day when his Wife Nicole was staying at her mother's house.) Raymond Townsend also sent me a picture while I was at work of himself erect telling me that "this is what I do to him." I have preserved same for the appropriate forum as well. He continuously referred to his obsession with my breasts in the workplace and in his messages to me.

Due to the persistent sexual harassment by Raymond Townsend I was hospitalized on several occasions, from anxiety, dread and emotional disgust. Since I had no other job opportunity as a Teacher I returned to work in late February after my hospitalization at Winthrop Hospital and the sexual assault occurred on my last day of work, Saturday, February 21, 2009. The two employees who were present and who witnessed Raymond Townsend forcing me into the bathroom were "Shaw" and "Frankie." I do not know their last names. Despite my yelling for help, they refused to intervene against Raymond Townsend since he was their boss as well.

My verified last day of work was February 21, 2009 and I was paid up to and including that date by U.S. Limousine. The very next day Raymond Townsend told me not to come to work any longer.

A few weeks later however, Raymond Townsend sent me a text message stating that he will fire "Kathy" in the Wedding Department and offered me her job, which I verily believe was communicated to me only due to his guilt for having sexually assaulted me on February 21, 2009 and the possible consequences to him and the firm. I have also preserved this communication.

Despite counsel's contention John Sansone did not call me on April 20, 2009. I have preserved a message from John Sansone which he made on April 22, 2009 offering me Sunday employment. Assuming counsel's statement as accurate that U.S. Limousine received my Complaint on April 21, 2009 from the Division of Human Rights the message for re-employment by John Sansone after receipt of that Complaint is further evidence of their complicity with Raymond Townsend and further evidence of violation(s) under Federal and New York State Law(s).

Coincidentally, the day after I was sexually assaulted by Raymond Townsend on February 21, 2009, John Sansone sent me messages, (which are preserved) telling me that I should not trust "Ray" that Ray " isn't my buddy" and that I should "calm down" and that he (John Sansone) would see what he could do in the morning.

Consider further that despite Respondent(s)' counsel's contention that my days and hours were cut due to the economic slowdown of the US Limousine Service business, after the sexual assault I was offered other various positions at the firm, and additional days and hours to my earlier schedule and my weekly Payroll Statements verify that my days and hours for the year prior to my termination were consistent and unaffected by any economic downturn in the Respondent(s)' business. My services were terminated simply since I would not engage the General Manager in sex.

In summary I submit that the subject "Position Statement" is a sham and is incredible. Respondent(s) cannot withstand the documentary proof which I have preserved, including the Respondent's weekly Payroll Statements for my employment at U.S. Limousine "off the books" and should not be given any weight in evaluating my Complaint. The Respondent(s)' "Position Statement" constitutes a full admission of the sexual content of the persistent messages sent to me by Raymond Townsend. My only responses to those messages, phonecalls, texts, photographs, and sexual gestures toward me in the workplace was to reject same. That sexual rejection constituted the only basis for my termination, predicated only by reason of the Respondents' utter and callous disregard for the law.

Respectfully yours,

Geraldyn Ganci
GERALYN GANCI

cc- Laurence I. Cohen, Esq.

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FAX: 516-354-0993
EMAIL: RTownsend@uslimoservice.com
Visit us on the Web at USLIMOSERVICE.com

M

MEMO TO ALL US LIMO OFFICE PERSONNEL

PLEASE NOTE THAT OUR MONTHLY
OFFICE MEETING WILL BE HELD ON
WEDNESDAY JANUARY 9TH 2008 AT
500PM. PLEASE NOTE THAT IT IS
MANDATORY THAT YOU ATTEND.

Raymond Townsend
General Manager
U.S. LIMOUSINE SERVICE, LTD.

PLEASE REMEMBER OUR CHILDREN. PLEASE DO NOT DRINK AND DRIVE!

000263

TO ALL U.S LIMO EMPLOYEES

RE: **DAYLIGHT SAVINGS**
TIME BEGINS THIS SATURDAY
EVENING WHEN YOU GO TO
BED. PLEASE SET YOUR
CLOCKS FORWARD ONE HOUR
FOR SUNDAY.

EXAMPLE

900AM IS 1000AM.

MAKE SURE YOU ARE ON TIME
SUNDAY

RAY TOWNSEND

2008

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